




# Sedex Members Ethical Trade Audit Report

Version 6.0



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 402575484	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 402576429
Business name (Company name):	Glenmargon Global		
Site name:	Glenmargon Global		
Site address: <i>(Please include full address)</i>	D.No.1/302, Kalipalayam Pudur, S.C.Palayam Post, Uthukuli Via, Tirupur-638752	Country:	India
Site contact and job title:	Mr. K.K. Vadivel- Proprietor		
Site phone:	+91 9994866667	Site e-mail:	vadivel@glenmargon.com
SMETA Audit Type:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety	<input type="checkbox"/> Environment <input type="checkbox"/> Business Ethics
Date of Audit:	05- Jul-2018 & 06- Jul 2018		

<b>Audit Company Name &amp; Logo:</b> <b>SGS India Private Limited</b>  	<b>Report Owner (payee):</b>  <b>GLENMARGON GLOBAL</b> <i>(If paid for by the customer of the site please remove for Sedex upload)</i>
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Audit Conducted By					
Commercial	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
NGO	<input type="checkbox"/>	Retailer	<input type="checkbox"/>	Brand Owner	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

## Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.0 April 2017 was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

(2) The audit scope was against the following reference documents

### 2-Pillar SMETA Audit

- ETI Base Code
- SMETA Additions
  - Management systems and code implementation,
  - Entitlement to Work & Immigration,
  - Sub-Contracting and Home working,

### 4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)

(3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non compliances on both the audit report, CAPR and on Sedex.

(4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

## SMETA Declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Best Practice Guidance and SMETA Measurement Criteria.

- (1) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (2) Any Non-Compliance against customer code alone shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Any exceptions to this must be recorded here (e.g. different sample size):

Auditor Team (s) (please list all including all interviewers):

Lead auditor: Satheesh Kumar S

Team auditor: NA

Interviewers: Satheesh Kumar S

Report writer: Satheesh Kumar S

Report reviewer: Sabina Pinto

Date of declaration: 12<sup>th</sup> Jul 2018

*Note: The focus of this ethical audit is on the ETI Base Code and local law. The additional elements will not be audited in such depth or scope, but the audit process will still highlight any specific issues.*

*This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post-audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.*

## Non-Compliance Table

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i> <i>Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>		Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Summary of Findings <i>(note to auditor, summarise in as few words as possible, all findings, NC, Obs &amp; GE's.)</i>
		ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	Human Rights			<input checked="" type="checkbox"/>	<input type="checkbox"/>		03		<ul style="list-style-type: none"> <li>It was noted from the document review that the facility does not have any policy covering human rights impacts and issues, and not communicated to all appropriate parties, including its own suppliers.</li> <li>Factory has not appointed a person responsible for implementing standard concerning universal rights.</li> <li>Factory has not communicated universal right policy to their relevant stakeholders.</li> </ul>
0B	<u>Management systems and code implementation</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
1.	Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
2	<u>Freedom of Association</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
3	<u>Safety and Hygienic Conditions</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	04			<ul style="list-style-type: none"> <li>It was noted from the tour of site that the Safety guard were found tampered in 6 out of 7 cutting machines.</li> <li>It was noted from the review of document that the facility has not obtained pressure vessel Inspection certificate for the installed diesel Boiler.</li> </ul>

										<ul style="list-style-type: none"> <li>It was noted from the review of document and discussion with management that the facility has not formed canteen committee as per requirement.</li> <li>It was noted from the tour of site that a crack has been observed in the creche. (No kids were found on the day of audit)</li> </ul>
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>					
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>					
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>					
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>					
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>					
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
10B2	Environment 2-Pillar		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					

Site Summary:

- Factory does not interfere with the workers' rights.
- The factory has not appointed a person responsible for implementing standard concerning universal standards.
- The factory has not communicated universal right policy to their relevant stake holders/suppliers.
- There was no evidence of child labor in the factory.
- There was no evidence of forced/bonded/involuntary labor in the factory.
- In general, the working conditions at the facility was found good and well maintained.
- No discrimination was found on any grounds.
- Factory has not engaged with any of home workers.
- As confirmed by the employees during their interviews, there is no physical abuse or discipline, threat of physical abuse, sexual or other harassment and verbal abuse in the factory.
- Factory respects the legal minimum wages and all the workers are aware of their wages.
- Factory respects legal limits on working hours.
- Factory management was cooperative during the audit.
- Factory respects the legal minimum wages and all the workers are aware of their wages.
- Factory respects legal limits on working hours.
- Factory management was cooperative during the audit.

**Non-Conformance:**

- It was noted from the tour of site that the Safety guard were found tampered in 6 out of 7 cutting machines.
- It was noted from the review of document that the facility has not obtained pressure vessel Inspection certificate for the installed diesel Boiler.
- It was noted from the review of document and discussion with management that the facility has formed canteen committee as per requirement.
- It was noted from the tour of site that a crack has been observed in the creche. (No kids were found on the day of audit)

**Observations:**

- It was noted from the document review that the facility does not have any policy covering human rights impacts and issues, and not communicated to all appropriate parties, including its own suppliers.
- Factory has not appointed a person responsible for implementing standard concerning universal rights.
- Factory has not communicated universal right policy to their relevant stakeholders.

*\*Please note the table above records the total number of Non-compliances (NC), Observations (Obs) and Good Examples (GE). This gives the reviewer an indication of problem areas but does not detail severities of each issue – Reviewers need to check audit results by clause.*

## Site Details

Site Details																																		
A: Company Name:	Glenmargon Global																																	
B: Site name:	Glenmargon Global																																	
C: Applicable business and other legally required licence numbers and documents for example, business license no, liability insurance, any other required government inspections	Factory licence bearing License number TP18478 for employing Manpower up to 500 employees and installing Machines upto 250 HP which was found valid till 31/12/2019.																																	
D: Products/Activities at site, for example, garment manufacture, electricals, toys, grower	All Kind of Knitted Garments.																																	
E: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>The facility was incorporated in the existing location since 2016 with build-up area of 1.89 acres with build-up area 50498 Sqft.</p> <table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Building 1 Ground floor</td> <td>Cutting, Sticking, Fusing</td> <td>since 2016</td> </tr> <tr> <td>Building 1 First floor</td> <td>Checking, Sewing, Trimming</td> <td>since 2016</td> </tr> <tr> <td>Building 1 Second floor</td> <td>Cutting, Packing, Sewing</td> <td>since 2016</td> </tr> <tr> <td>Building 2</td> <td>Fabric Storage, Ironing &amp; packing</td> <td>since 2016</td> </tr> <tr> <td>Building 3</td> <td>Stores</td> <td>since 2016</td> </tr> <tr> <td>Building 4</td> <td>Godown</td> <td>since 2016</td> </tr> <tr> <td>Utility 1</td> <td>Canteen &amp; Dining hall</td> <td>since 2016</td> </tr> <tr> <td>Utility 2</td> <td>Restrooms, Creche, Office lab</td> <td>since 2016</td> </tr> <tr> <td>Utility 3</td> <td>Security</td> <td>since 2016</td> </tr> <tr> <td>Is this a shared building?</td> <td>Yes</td> <td>NA</td> </tr> </tbody> </table>	Production Building no	Description	Remark, if any	Building 1 Ground floor	Cutting, Sticking, Fusing	since 2016	Building 1 First floor	Checking, Sewing, Trimming	since 2016	Building 1 Second floor	Cutting, Packing, Sewing	since 2016	Building 2	Fabric Storage, Ironing & packing	since 2016	Building 3	Stores	since 2016	Building 4	Godown	since 2016	Utility 1	Canteen & Dining hall	since 2016	Utility 2	Restrooms, Creche, Office lab	since 2016	Utility 3	Security	since 2016	Is this a shared building?	Yes	NA
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Is this a shared building?	Yes	NA																																
F: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider																																	



	<input type="checkbox"/> Sub-Contractor
G: Month(s) of peak season: (if applicable)	Consistency throughout the year
H: Process overview: <i>(Include products being produced, main operations, number of production lines, main equipment used)</i>	The main operations carried out in this premise are Cutting, stitching, checking, Ironing Packing.
I: What form of worker representation / union is there on site?	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None
J: Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
K: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes approx. % of workers in on site accommodation
L: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes approx. %
M: Were the site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No If No, please give details : NA

Audit Parameters			
A: Time in and time out	Day 1 Time in: 9.30 Am Day 1 Time out: 5:45 Pm	Day 1 Time in: 9.00 Am Day 1 Time out: 5:30 Pm	
B: Number of Auditor Days Used:	2 Mandays (1 Auditors x 2 Day)		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other – Define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If <b>Yes</b> , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. K.K. Vadivel- Proprietor		
H: Is further information available (if Y please contact audit company for details )	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	N/A		
J: Previous audit type:	N/A		
K: Was any previous audit reviewed during this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	Worker committee were present during the audit		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	NA		

## Worker Analysis

“ The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national and where they do not intend to remain permanently or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	135	0	0	83	0	0	0	218
Worker numbers – female	112	0	0	9	0	0	0	121
Total	247	0	0	92	0	0	0	339
Number of Workers interviewed – male	12	0	0	4	0	0	0	16
Number of Workers interviewed – female	9	0	0	1	0	0	0	10
Total – interviewed sample size	21	0	0	5	0	0	0	26

A: Nationality of Management	Indian
B: Majority nationality of workers	Main countries: Country 1: <u>India</u> approx % total workforce: 100 Country 2: _____ approx % total workforce _____ Country 3: _____ approx % total workforce _____
C: Worker remuneration (management information)	<u>90</u> % workers on piece rate _____% hourly paid workers 10_% salaried workers  Payment cycle: _____% daily paid _____% weekly paid <u>100</u> % monthly paid _____% other – please give details

Worker Interview Summary	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	2 groups of 5 male workers 2 groups of 5 female workers
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	Male: 3      Female: 3
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If N, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	None.
I: What did the workers like the most about working at this site?	Working environment.
J: Any additional comment(s) regarding interviews:	None
K: Attitude of workers to hours worked:	Good
L. Is there any worker survey information available?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>If Yes, please give details:</i>	
M: Attitude of workers: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i>	
<ul style="list-style-type: none"> <li>No negative comments received from the workers against the management.</li> <li>No walk outs / strikes have taken place in the factory till date.</li> </ul>	

- Workers confirmed that the factory does not hire any child labour.
- It was observed that all the workers are freely working in the factory
- Workers are happy with the present work place facilities / conditions in the factory.
- Workers confirmed that overtime is voluntary and overtime is requested only on urgent business needs.
- Workers are satisfied with the attitude of the management towards them.

**N: Attitude of worker's committee/union reps:**

*(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk*

Workers representatives freely communicate freely without any fear .

**O: Attitude of managers:**

*(Include attitude to audit, and audit process. Both positive and negative information should be included)*

Managers were co-operative during the audit. Further, they were receptive to the observations during the audit and showed keen interest to improve the conditions.

## Audit Results by Clause

**0A: Human Rights**  
[\(Click here to return to NC-table\)](#)

**0.A. Guidance for Observations**

0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.

0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights

0.A.3 Businesses shall identify their stakeholders and salient issues.

0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.

0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.

0.A.6 *Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.*

Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their human rights responsibilities.

**Current Systems and Evidence Examined**

*To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*

**Current systems:**

There is no apparent universal rights concern, this was confirmed through employee interview, further the The facility maintains policies and procedures related. No child labour/child labour remediation plans, No forced labour, no harsh and inhuman treatment, no discrimination, health & safety, freedom of association, Working hours, and the same was implemented and monitored the effectiveness of it regularly , further to this commitment to these policy were signed/obtained from suppliers/stakeholders.

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):**

Details: Standing order, employee terms and conditions, Committee meeting records and company policies.

Any other comments: None

A: Policy statement that expresses commitment to respect human rights?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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	<p>Please give details: It was noted from the document review that the facility does not have any policy covering human rights impacts and issues, and not communicated to all appropriate parties, including its own suppliers</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>Please give details: Factory has not appointed a person responsible for implementing standard concerning universal rights.</p> <p>Name: NA          Job title: NA</p>
<p>C: Does the businesses have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>Please give details: The facility has provided suggestion / compliant box at strategic locations</p>
<p>D: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>Please give details:</p> <p>All employee information and personnel files are kept locked away in the human resources office and only viewed by the HR manager and his team.</p>

Findings	
<p><b>Finding: Observation</b> <input checked="" type="checkbox"/>      <b>Company NC</b> <input type="checkbox"/></p> <p><b>Description of observation:</b>            It was noted from the document review that the facility does not have any policy covering human rights impacts and issues, and not communicated to all appropriate parties, including its own suppliers</p> <p><b>Local law or ETI/Additional elements / customer specific requirement:</b>            O.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.</p> <p><b>Comments:</b> It is recommended to the factory to create and implement a policy regarding universal rights.</p>	<p><b>Objective evidence observed:</b>            During Document Review</p>



<p><b>2.Finding: Observation</b> <input checked="" type="checkbox"/> <b>Company NC</b> <input type="checkbox"/></p> <p><b>Description of observation:</b> Factory has not appointed a person responsible for implementing standard concerning universal rights.</p> <p><b>Local law or ETI/Additional elements / customer specific requirement:</b> 0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights</p> <p><b>Comments:</b> It is recommended to the factory to appoint a person responsible for implementing standards concerning universal rights.</p>	<p>During Document Review</p>
<p><b>3.Finding: Observation</b> <input checked="" type="checkbox"/> <b>Company NC</b> <input type="checkbox"/></p> <p><b>Description of observation:</b> Factory has not communicated universal right policy to their relevant stakeholders.</p> <p><b>Local law or ETI/Additional elements / customer specific requirement:</b> 0.A.3 Businesses shall identify their stakeholders and salient issues. 0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers</p> <p><b>Comments:</b> It is recommended to factory to create and communicate the universal right policy to all their stakeholders.</p>	<p>During Document Review</p>

Good examples observed:	
Description of Good Example (GE):	Objective Evidence Observed:

## Measuring Workplace Impact

Workplace Impact		
<p>A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)</p>	<p>Last year: 30 %</p>	<p>This year 40 %</p>
<p>B: % Quarterly (90 days) turnover # terminations from the first of the 90 day period through to the last day of the 90 day period / [(# employees on the 1<sup>st</sup> of day of 90 day period + # employees on the last day of the 90 day period) / 2]</p>	<p>20 %</p>	

C: % absenteeism # of days lost through job absence in the month / [(# employees on 1 <sup>st</sup> of the month + # employees on the last day of the month / 2] * # available workdays in the month	Last year: 20 %	This year 18 %
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: As per records there are no accidents happened in twelve months	
F: # work related accidents and injuries per 100 workers [# work related accidents and injuries * 100] / # total workers]	Last year: Number:	This year: Number:
G: Lost day work cases per 100 workers [(# lost days due to work accidents and work related injuries * 100) / # total workers]	This year: 0	Last year: 0
H: % workers that work on average more than 48 hours / week in the last 6 / 12 months	6 months __0__% workers	12 months __0__% workers
I: % workers that work on average more than 60 hours / week in the last 6 / 12 months	6 months __0__% workers	12 months __0__% workers
J: % Workers report that they know what paid leave is due to them (I.e. is it communicated and understood)	__100__% workers	
K: % complaints resolved / grievances responded to.	__0__% complaints / grievances responded to  No complaint	__0__% complaints / grievances resolved  No complaint

**OB: Management system and Code Implementation**

[\(click here to return to NC Table\)](#)

- 0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.
- 0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.
- 0.3 Suppliers are expected to communicate this Code to all employees.
- 0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

**Current Systems and Evidence Examined**

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

**Current systems:**

- The facility has identified the list of Suppliers with them
- The facility is providing training based on ETI base code to all its employees
- The supplier should complete the supplier evaluation report before the empanelment.

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):**

- The Auditor verified all the ETI related policies signed by top management
- Training records of employees on ETI base code. Last Training was conducted on 14/5/2018

<b>Management Systems:</b>	
A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe: NO fines
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: The facility has a policy regarding forced labour, child labour, discrimination, harassment & abuse.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Yes. All the Workers are given training and factory has displayed all the policies in a local language.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: All the staff and workers are given training during induction itself and factory has displayed all the policies in notice boards
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe : The training records are kept in place
F; Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe:
G: Is there a Human Resources manager/department?	<input checked="" type="checkbox"/> Yes

<p>If Yes, please detail.</p>	<p><input type="checkbox"/> No Please describe:  Manager : Mr. R Karthikeyan -Admin Manager</p>
<p>H: Is there a senior person /manager responsible for implementation of the Code</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Mr. R Karthikeyan -Admin Manager</p>
<p>I: Is there a policy to ensure all worker information is confidential</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: They have adequate software facility to keep all the workers detail confidential</p>
<p>J: Is there an effective procedure to ensure confidential information is kept confidential</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: All worker information is kept locked in files in the personnel office</p>
<p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility has identified basic risk associated to the industry. Last assessment was Conducted on 14/02/2018</p>
<p>L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Any problems found at internal audit are brought to the attention of senior management and corrections made</p>
<p>M: Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: There is no communicating the principles of this Ethical Code to suppliers</p>
<p><b>Land rights</b></p>	
<p>N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility is situated in own land and have full rights to run the industry</p>
<p>O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility is situated in own land and have full rights to run the industry</p>

<p>P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, how does the company obtain FPIC: The facility is situated in own land and have full rights to run the industry</p>
<p>Q: Is there evidence that facility site compensated the owner/lessor for the land prior to the facility being built or expanded. Please give details.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility is situated in own land and have full rights to run the industry</p>
<p>R. Does the Facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts Please give details.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility is situated in own land and have full rights to run the industry</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: The facility is situated in own land and have full rights to run the industry</p>

Non-compliance:	
<p><b>1. Description of non-compliance: None Observed on the Day of audit</b>  <input type="checkbox"/> NC against ETI/Additional Elements      <input type="checkbox"/> NC against Local Law  <input type="checkbox"/> NC against customer code:  None Observed on the Day of audit</p> <p><b>Local law and/or ETI requirement: None</b></p> <p><b>Recommended corrective action: None</b></p>	<p><b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i></p>

Observation:	
<p><b>Description of observation: None Observed on the Day of audit</b></p> <p><b>Local law or ETI requirement: None</b></p> <p><b>Comments: None</b></p>	<p><b>Objective evidence observed:</b></p>

<b>Good Examples observed:</b>	
Description of Good Example (GE): None	<b>Objective evidence observed:</b>

**1: Freely Chosen Employment**

[\(Click here to return to NC-table\)](#)

**ETI**

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

**Current Systems and Evidence Examined**

*To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*

**Current systems:**

- The workers are not required to lodge any original documents or any monetary deposits during employment.
- Workers are free to move from work place after standard working hours
- All employees can relieve themselves from duty after giving reasonable notice time.

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):**

- Policies
- Employees personnel files
- Time cards
- Full and final settlement records
- Workers interview and management interaction

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  If Yes please give details and category of workers affected</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  If yes please give details and category of worker affected</p>
<p>C: Is there Any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  If yes please give details and category of worker affected</p>
<p>D: Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  Please describe finding:</p>
<p>E: If any part of the business is UK based / registered &amp; turnover is 36m+ there is a requirement to</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No                  Please describe finding:</p>

publish a 'modern day slavery statement. Is there a modern day slavery statement published	<input checked="" type="checkbox"/> Not applicable
Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding:
F: Does the site understand the risks of forced / trafficked / bonded labour in it's supply chain	<input type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: <input checked="" type="checkbox"/> Not applicable If yes please give details and category of worker affected
G: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding:

Non-compliance:	
<p><b>1. Description of non-compliance: None Observed on the Day of Audit</b></p> <p><input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law:    <input type="checkbox"/> NC against customer code:</p> <p><b>None Observed on the Day of audit</b></p> <p><b>Local law and/or ETI requirement : None</b></p> <p><b>Recommended corrective action: None</b></p>	<p><b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i></p>

Observation:	
<p><b>Description of observation: None Observed on the Day of Audit</b></p> <p><b>Local law or ETI requirement: None</b></p> <p><b>Comments: None</b></p>	<p><b>Objective evidence observed:</b></p>

Good Examples observed:	
<p>Description of Good Example (GE): None</p>	<p><b>Objective evidence observed:</b></p>



**2: Freedom of Association and Right to Collective Bargaining are Respected**

[\(Click here to return to NC-table\)](#)  
[\(Click here to return to Key Information\)](#)

**ETI**

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.  
 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.  
 2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.  
 2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

**Current Systems and Evidence Examined**

*To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*

**Current systems:**

The union has been established.

- There is no Union at the facility
- The facility respects employee's rights and formed workers committee with elected representation from workers side and conduct meeting once in two months.
- The facility has placed Suggestion box at prominent places for employees to drop their suggestion

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):**

- Workers committee meeting- last meeting was conducted on 12.06.2018
- Employees interview
- Policy on freedom of association
- Election record- last election was conducted on 8.02.2018

A: What form of worker representation/union is there on site?	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D: Is there any other form of effective worker/management communication channel? (Other	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

<p>than union/worker committee) e.g. H&amp;S, sexual harassment</p>	<p>Describe: : Suggestion box, Sexual harassment prevention committee, Health &amp; safety committee.</p> <p>Is there evidence of free elections?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>	
<p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Details: Adequate committee formation found.</p>	
<p>F: Name of union and union representative, if applicable:</p>	<p>NA</p>	<p>Is there evidence of free elections?  <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>
<p>G: If no union what is parallel means of consultation with workers e.g. worker committees?</p>	<p>Workers Committee</p>	<p>Is there evidence of free elections?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>H: Are all workers aware of who their representatives are?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Workers are aware of their representatives</p>
<p>I: Were worker representatives freely elected?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Date of election is 8/2/2018</p>
<p>J: Do workers know what topics can be raised with their representatives?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Yes workers are aware of the topics to be raised in committees.</p>
<p>K: Were worker representatives/union representatives interviewed</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No                  If <b>Yes</b>, please state how many: 1</p>	
<p>L: State any evidence that union/worker's committee is effective?                  Specify date of last meeting; topics covered; how minutes were communicated etc.</p>	<p>Factory has formed Works Committee with elected worker representatives and conducts regular meetings once in a month and minutes are documented.                  The topics covered in the meeting are about general work place environment and needs of the workers.                  Last meeting held on 12/06/2018 and same was communicated through workers representatives to workers and confirmed during workers interviews.</p>	
<p>M: Are any workers covered by Collective Bargaining Agreement (CBA)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	
<p>N: If <b>Yes</b> what percentage by trade Union/worker representation</p>	<p>NA</p>	<p>No CBA The facility practise Minimum wages as per notification</p>
<p>O: If <b>Yes</b>, does the Collective Bargaining Agreement (CBA) include rates of pay</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p>	

<b>Non-compliance:</b>	
<p><b>1. Description of non-compliance: None Observed on the Day of Audit</b>  <input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law:    <input type="checkbox"/> NC against customer code:  <b>None Observed on the Day of audit</b>   <b>Local law and/or ETI requirement : None</b>   <b>Recommended corrective action: None</b></p>	<p><b>Objective evidence observed:</b>  <i>(where relevant please add photo numbers)</i></p>

<b>Observation:</b>	
<p><b>Description of observation: None Observed on the Day of Audit</b>   <b>Local law or ETI requirement: None</b>   <b>Comments: None</b></p>	<p><b>Objective evidence observed:</b></p>

<b>Good Examples observed:</b>	
<p>Description of Good Example (GE): None</p>	<p><b>Objective evidence observed:</b></p>

**3: Working Conditions are Safe and Hygienic**

[\(Click here to return to NC-table\)](#)  
[\(Click here to return to Key Information\)](#)

**ETI**

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

**Current Systems and Evidence Examined**

*To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*

**Current systems:**

- Mr.Karthikeyan - Admin manager is responsible for Health & safety issues.
- Facility has health & safety committee which meets regularly. Last meeting was held on 19/06/18
- The facility conducts Risk assessment for the facility as well as for all the Operations

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):**

- Health & safety policy
- The facility is conducting Fire evacuation drill once in two months last drills was conducted on 12.05.2018.
- The facility has obtained Stability certificate from a competent person which is valid up to 14/06/2019.
- Training records
- Factory tour

<p>A: Does the facility have general Health &amp; Safety and occupational Health &amp; Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Details:</p> <p>The facility has policy on Health &amp; safety and posted in the notice board in local language</p>
<p>B: Are the policies included in worker's manual?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Details:</p>

<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  Details: no such additions</p>
<p>D: Are visitors to the site informed on H&amp;S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Details:                  H&amp;S instructions and PPE's are provided by the front office personnel during the entry</p>
<p>E: Is a medical room or medical facility provided for workers?                   If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Details:                  The facility comply with the requirement.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Details:                  The facility has given first aid training to 20 employees through St. Johns ambulance on 22/06/18</p>
<p>G: Where facility provides worker transport - it is fit for purpose, safe and maintained and operated by competent persons e.g. buses and other vehicles</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No                  Details: No transport provided</p>
<p>H: Secure personal storage space is provided for workers in their living space and is fit for purpose</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Details:                  Facility has provided separate storage cupboard for all the workers</p>
<p>I: H&amp;S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and there are controls to reduce identified risk</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Details: Assessment conducted and records reviewed</p>
<p>J: Is the site meeting its legal obligations on environmental requirements</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p>



<p><b>ETI requirement:</b> 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p><b>Recommended corrective action:</b> It is recommended to the facility shall obtain the pressure vessel inspection certificate from the concerned authority .</p> <p><b>3. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI      <input checked="" type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:          It was noted from the review of document and discussion with management that the facility has not formed canteen committee as per requirement</p> <p><b>Local law:</b>          In accordance with Tamil Nadu Factories Rules, 1950, Chapter V, Rule 70 (1) The manager shall appoint a Canteen Managing Committee which shall be consulted from time to time as to –          1. the quality and quantity of foodstuffs to be served in the canteen;          2. the arrangements of the menus;          3. times of meals in the canteen; and          4. any other matter as may be directed by the Committee.</p> <p><b>ETI requirement:</b> 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p><b>Recommended corrective action:</b> It is recommended that the facility shall form a canteen committee as per requirement.</p>	<p>From Site Tour</p>
<p><b>4. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI      <input checked="" type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:          It was noted from the tour of site that a crack has been observed in the creche. (No kids were found on the day of audit)</p> <p><b>Local law:</b> In accordance with Factories rules 1950 -Section 48 sub-section (3) Rules 73 -Creches (2) The building in which the creche is situated shall be soundly constructed and all the walls and roof shall be of suitable heat-resisting materials and shall be water-proof. The floor and internal walls of the creche shall be so laid or finished as to provide a smooth impervious surface,</p> <p><b>ETI requirement:</b> 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p>	<p>From Site Tour</p>

<p><b>Recommended corrective action:</b> It is recommended that the facility shall ensure all the buildings are free from Cracks.</p>	
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Observation:	
<p><b>Description of observation:</b> None Observed on the day of Audit</p> <p><b>Local law or ETI requirement:</b> None</p> <p><b>Recommended corrective action:</b> None</p>	<p><b>Objective evidence observed:</b></p>

Good Examples observed:	
<p>Description of Good Example (GE): None</p>	<p><b>Objective Evidence Observed:</b></p>



**4: Child Labour Shall Not Be Used**

[\(Click here to return to NC-table\)](#)  
[\(Click here to return to Key Information\)](#)

**ETI**

- 4.1 There shall be no new recruitment of child labour.
- 4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
- 4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

**Current Systems and Evidence Examined**

*To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*

**Current systems:**

- The Facility collects age proof documents from the employees during employment to verify the age.
- The Facility recruit employees directly and not through contractors
- The Facility gives regular training to their employees on ETI standards.

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):**

- Documents examined
- Child labour policy
- Workers personnel file which contains age proof documents
- Registers of young, Adult workers,
- Workers interview
- Factory tour

A: Legal age of employment	14+ to 18 years with restriction. 18+They can engage as per local law.
B: Age of youngest worker found:	21
C: Children present on workflow but not working at time of audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %
E: Workers under 18 subject to hazardous work assignments? <a href="#">(Go to clause 3 – Health and Safety)</a>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Y give details

<b>Non-compliance:</b>	
<p><b>1. Description of non-compliance: None Observed on the Day of Audit</b>  <input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law:    <input type="checkbox"/> NC against customer code:            None observed  <b>Local law and/or ETI requirement : None</b>   <b>Recommended corrective action: None</b></p>	<p><b>Objective evidence observed:</b>  <i>(where relevant please add photo numbers)</i></p>

<b>Observation:</b>	
<p><b>Description of observation: None observed on the day of Audit</b>   <b>Local law or ETI requirement: None</b>   <b>Comments: None</b></p>	<p><b>Objective evidence observed:</b></p>

<b>Good Examples observed:</b>	
<p>Description of Good Example (GE):</p>	<p><b>Objective Evidence Observed:</b></p>

**5: Living Wages are Paid**

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**ETI**

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

**Current Systems and Evidence Examined**

*To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*

**Current systems:**

- Pay roll record (May 2018, July 2017 and Dec 2017)
- ESI and PF challans and returns
- Employment order verification of sampled workers
- Wage slip
- Remuneration policy
- List of holidays (Form#: 5)

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):**

- Legal benefits like Provident Fund, Employee State Insurance are provided for all the employees.
- Factory issues wage slips with detailed break up in local language to all the workers.
- Workers interviews confirmed that factory has provided with written and understandable information about their employment conditions in respect of wages before they enter employment.

**Non-compliance:**

**1. Description of non-compliance: None Observed on the Day of Audit**

NC against ETI code:  NC against Local Law:  NC against customer

None observed

**Local law and/or ETI requirement : None**

**Objective evidence observed:**

*(where relevant please add photo numbers)*

**Recommended corrective action: None**

<b>Observation:</b>	
<b>Description of observation: None observed on the day of Audit</b> <b>Local law or ETI requirement: None</b> <b>Comments: None</b>	<b>Objective evidence observed:</b>

<b>Good Examples observed:</b>	
Description of Good Example (GE): None	<b>Objective Evidence Observed:</b>

**Summary Information**

<b>Criteria</b>	<b>Local Law</b> <i>(Please state legal requirement)</i>	<b>Actual at the Site</b> <i>(Record site results against the law)</i>	<b>Is this part of a Collective Bargaining Agreement?</b>												
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 8 hours per day, 48 hours per week, 208 hours per month	8 hours per day, 48 hours per week, 208 hours per month	<input type="checkbox"/> Yes <input type="checkbox"/> No												
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 2 hours per day, 12 hours per week and 50 hours per quarter	No Overtime at site	<input type="checkbox"/> Yes <input type="checkbox"/> No												
D: wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	<b>Legal minimum:</b> Factory has to follow the Minimum wages for tailoring industry  <b>Per Day:</b> <table border="1" data-bbox="687 1704 971 1883"> <tr><td>Tailor</td><td>331.38</td></tr> <tr><td>Cutter</td><td>326.46</td></tr> <tr><td>Checker</td><td>331.38</td></tr> <tr><td>Ironer</td><td>315.81</td></tr> <tr><td>Packer</td><td>311.73</td></tr> <tr><td>Helper</td><td>311.73</td></tr> </table>	Tailor	331.38	Cutter	326.46	Checker	331.38	Ironer	315.81	Packer	311.73	Helper	311.73	Factory follows the Minimum wages as follows  <b>Per Day: Ranging from INR 322.00 to 483.00</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No
Tailor	331.38														
Cutter	326.46														
Checker	331.38														
Ironer	315.81														
Packer	311.73														
Helper	311.73														

E: overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: Double the normal rate of wages	Double the normal rate of wages as per policy	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
--	---	---	--

<b>Wages analysis:</b> <a href="#">(Click here to return to Key Information)</a>		
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: If <b>No</b> , why not?	NA	
C: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	26 sample of workers time and wage records were verified from (May 2018, Dec 2017 and July 2017)	
D: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If <b>Yes</b> , please give details: INR <b>322.00 to 483.00</b>
E: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	If <b>No</b> , please give details:
F: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	Lowest Wages found: INR 190.00	Please indicate the breakdown of workforce per earnings: Per day:  <b>INR 322.00 to 483.00</b>
	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	___% of workforce earning under min wage ___% of workforce earning min wage 100 % of workforce earning above min wage
G: Bonus (amount specify)	Bonus Scheme found: The facility Pays Minimum bonus @ 8.33%  Last Bonus was paid on 16.10.17	
H: What deductions are required by law e.g. social insurance? Please state all types:	EPF 12% ESI 1.75%	
I: Have these deductions been made? Please list all deductions that have/have not been made.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, please describe	

J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details:
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered Yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please specify amount/time: No defined living wages
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details:
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: No defined living wages. They are following the local government prescribed minimum wages to all categories of workers.
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Wage record were verified
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other If other explain:

**6: Working Hours are not Excessive**

[\(Click here to return to NC-table\)](#)  
[\(Click here to return to Key Information\)](#)

**ETI**

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where **all** of the following are met:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.

**Current Systems and Evidence Examined**

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

**Current systems:**

- Working hours policy
- Time records (May 2018, July 2017 and Dec 2017)
- Interaction with management staff and employees

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):**

- Factory respects legal working hours of 8 hours per day and works in general shifts.
- In & out time of all workers is registered using time card attendance monitoring System.
- Every Sunday is a holiday for all the workers.
- Workers interviews confirmed that overtime is voluntary

<b>Non-compliance:</b>	
<p><b>1. Description of non-compliance: None Observed on the Day of Audit</b></p> <p><input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law:    <input type="checkbox"/> NC against customer code:</p> <p>None observed</p> <p><b>Local law and/or ETI requirement : None</b></p> <p><b>Recommended corrective action: None</b></p>	<p><b>Objective evidence observed:</b> (where relevant please add photo numbers)</p>

<b>Observation:</b>	
<p><b>Description of observation: None Observed on the day of Audit</b></p> <p><b>Local law or ETI requirement: None</b></p> <p><b>Comments: None</b></p>	<p><b>Objective evidence observed:</b></p>

<b>Good Examples observed:</b>	
<p>Description of Good Example (GE):</p>	<p><b>Objective Evidence Observed:</b></p>

<b>Working hours' analysis</b>		
<p>Please include time e.g. hour/week/month <i>(Go back to Key information)</i></p>		
<b>Systems &amp; Processes</b>		
<p>A. What timekeeping systems are used: time card etc.</p>	<p><i>Describe: Bio Metric Attendance Monitoring System</i></p>	
<p>B: Is sample size same as in wages section</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <i>If N, please give details</i></p>	
<p>C: Are standard/contracted working hours defined in <b>all</b></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><i>If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Details</i></p>



contracts/employment agreements?		
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<i>If YES, please complete as appropriate:</i>
		<input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input type="checkbox"/> Variable hrs <input type="checkbox"/> Other
		<i>If "Other", Please define:</i>
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<i>If Y please %detail hours, % and types of workers &amp; affected and frequency</i>  Details
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period (where the law allows)?	Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	<i>Maximum number of days worked without a day off (in sample):</i>	
	6 days	
<b>Standard/Contracted Hours worked</b>		
G: Standard working hours over 48 per week found	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<i>If yes, % of workers &amp; frequency</i>
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<i>If YES, please give details</i>
<b>Overtime Hours worked</b>		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: No Overtime at facility	Per quarter: No Overtime at facility

J: Combined hours (standard/contracted plus= total) 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours	No overtime at site	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	Please detail evidence e.g. Wording of contract/employment agreement/handbook/worker interviews/refusal arrangements: NA
		Contracts state that overtime may be requested but it is voluntary
<b>Overtime Premiums</b>		
M: Are the correct legal overtime premiums paid?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A –	Please give details of normal day overtime premium as a % of <b>standard</b> wages: : As per the policy it is 200%.
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, please describe % of workers & frequency: As per the policy it is 200%.
O: ETI Code requires a prevailing standard to give greatest worker protection. If a site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant. Multi select is possible.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other	
	Please explain any checked boxes in N above e.g. detail of consolidated pay CBA or Other.	
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. Multi select is possible.	<input checked="" type="checkbox"/> <b>Overtime is voluntary</b> <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)	
	Please explain any checked boxes in R above	
	Overtime is Voluntary	

<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  If yes, please describe                  If yes, please describe :</p>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>

**7: No Discrimination is Practiced**  
*(Click here to return to NC-table)*

**ETI**

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

**Current Systems and Evidence Examined**

*To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*

**Current systems:**

- The facility is having policy on no discrimination, No pregnancy testing while employment

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):**

- No discrimination policy
- Policy on no pregnancy testing while employment
- Employees personal files
- Workers interview
- Sexual harassment Prevention meeting records

<p>A: Gender breakdown of Management + Supervisors (Include as one combined group)</p>	<p>Male: <u>64</u> %                  Female <u>36</u> %</p>
<p>B: Number of women who are in skilled or technical roles e.g. where specific</p>	<p>0</p>

qualifications are needed i.e. machine engineer / laboratory analyst	
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> access to training <input type="checkbox"/> promotion <input type="checkbox"/> termination or retirement  No evidence of discrimination found

**Professional Development**

A: What type of training and development are available for workers?	Please give details  All workers are given H&S training
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B: Are HR decisions on e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details:
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Non-compliance:	
<p><b>1. Description of non-compliance: None Observed on the Day of Audit</b></p> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code: None observed <b>Local law and/or ETI requirement : None</b>  <b>Recommended corrective action: None</b>	<p><b>Objective evidence observed:</b>                  (where relevant please add photo numbers)</p>

Observation:	
Description of observation: None	Objective evidence observed:
Local law or ETI requirement:	
Comments:	

<b>Good Examples observed:</b>	
Description of Good Example (GE): None	<b>Objective Evidence Observed:</b>

**8: Regular Employment Is Provided**

[\(Click here to return to NC-table\)](#)  
[\(Click here to return to Key Information\)](#)

**ETI**

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

**Additional Elements: Responsible Recruitment**

8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.

8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.

8.5 Employment agencies must only supply workers registered with them.

8.6 Workers pay no recruitment fee at any stage of the recruitment process.

8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

**Current Systems and Evidence Examined**

*To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*

**Current systems:**

- The facility recruits' employees directly into their Payroll
- The facility issues employment order to all its employees

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):**

- Workers personnel file including appointment order
- Social Security benefits records
- Standing order
- Workers interview
- Timecard

Non-compliance:	
<p><b>1. Description of non-compliance: None Observed on the Day of Audit</b></p> <p><input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law:    <input type="checkbox"/> NC against customer code:</p> <p>NONE observed</p> <p><b>Local law and/or ETI requirement : None</b></p> <p><b>Recommended corrective action: None</b></p>	<p><b>Objective evidence observed:</b> (where relevant please add photo numbers)</p>

Observation:	
<p><b>Description of observation: none observed</b></p> <p><b>Local law or ETI requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>

Good Examples observed:	
<p>Description of Good Example (GE): None</p>	<p><b>Objective Evidence Observed:</b></p>

### Responsible Recruitment

All Workers	
<p>A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?</p>	<p><input checked="" type="checkbox"/> Terms &amp; Conditions presented  <input checked="" type="checkbox"/> Understood by workers  <input checked="" type="checkbox"/> Same as actual conditions</p> <p>If any are unchecked, please describe finding and specific category (ies) of workers affected:</p>
<p>C: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>If Yes Please describe details and specific category(ies) of workers affected</p>

B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other
C: If any checked, give details:	No fees required. Hence not applicable

<b>Migrant Workers: No</b>	
<i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national and where they do not intend to remain permanently or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i>	
B: Type of work undertaken by migrant workers:	Total 92 National Migrant workers were worked (83 male + 9 Female)
C: Migrant worker recruitment	Total number of (in country recruitment agencies) used: India Total number of (outside of local country) recruitment agencies used
D: Migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and evidence of transaction is supplied by the facility to the worker.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding:
E: Are Any migrant workers in skilled, technical, or management roles	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</b>	#: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  If Yes number and example of roles - NA



**NON-EMPLOYEE WORKERS**

<b>Recruitment Fees:</b>	
A: Are there any fees	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other
C: If any checked, give details:	Not applicable.

<b>Agency Workers (if applicable): No</b> <i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i>	
A: Number of agencies used (average):	And names if available: No agency found working in the factory on the day of audit. Hence not applicable
B: Were agency workers' age/pay/hours included within scope of this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No  N/A Details

<p>E: Does the site have a system for checking labour standards of agencies? If yes, please give details.</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No                  N/A                  Please describe:</p>
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<b>Contractors:</b> <i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i>	
<p>A: Any contractors on site?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  Please describe finding: NA</p>
<p>B: If <b>Yes</b>, how many workers supplied by contractors</p>	<p>NA</p>
<p>C: Do all contractor workers understand their terms of employment?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No                  Please describe finding: NA</p>
<p>If <b>Yes</b>, please give evidence for contractor workers being paid per law:</p>	<p>NA</p>

8A: Sub-Contracting and Homeworking:

**8A: Sub-Contracting and Homeworking**  
[\(Click here to return to NC-table\)](#)  
[\(Click here to return to Key Information\)](#)

8A.1 There should be no sub-contracting unless previously agreed with the main client.  
 8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.

*Note to auditor on homeworking:*  
 Report on whether it is direct or via agents. How many workers, relationship with site and what control systems are in place.

*Note to auditor on subcontracting :* auditor should use this section for subcontractors of part made or wholly made finished goods, this section should not be used for raw material manufacturers unless instructed otherwise by customers

**Current Systems and Evidence Examined**

*To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*

**Current systems:**

- No home worker engaged by the factory.
- No process sub-contracted

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):**

- Production records
- List of suppliers
- Supplier Evaluation form
- Management Interview
- Worker Interview

**If any processes are sub-contracted – please populate below boxes**

Process Subcontracted	NA	NA
Name of factory	NA	NA
Address	NA	NA

Details: No subcontracting process

**Non-compliance:**

<p><b>1. Description of non-compliance: None Observed on the Day of Audit</b>  <input type="checkbox"/> NC against ETI code:      <input type="checkbox"/> NC against Local Law:      <input type="checkbox"/> NC against customer</p> <p><b>Local law and/or ETI requirement : None</b></p> <p><b>Recommended corrective action: None</b></p>	<p><b>Objective evidence observed:</b>  <i>(where relevant please add photo numbers)</i></p>
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Observation:	
<p><b>Description of observation:</b></p> <p><b>Local law or ETI/Additional elements requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>

Good Examples observed:	
<p>Description of Good Example (GE):</p>	<p><b>Objective Evidence Observed:</b></p>

Summary of sub-contracting – if applicable	
<input checked="" type="checkbox"/> Not Applicable please x	
<p>A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work hours or undeclared sub-contracting</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No            Please describe The auditor made a simple calculation based on the production capacity and output carried out.</p>
<p>B: If sub-contractors are used, is there evidence this has been agreed with the main client?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No            If <b>Yes</b>, summarise details:</p>
<p>C: Number of sub-contractors/agents used</p>	<p>None</p>
<p>D: Is there a site policy on sub-contracting?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No            If <b>Yes</b>, summarise details: The policies are in place.</p>

E: What checks are in place to ensure no child labour is being used and work is safe?	NA
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Summary of homeworking – if applicable			
<input checked="" type="checkbox"/> Not Applicable please x			
F: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , summarise details:		
G: Number of homeworkers	Male:	Female:	Total:
H: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		
I: If through agents, number of agents	NA		
J: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
K: How does site ensure worker hours and pay meet local laws for homeworkers?	NA		
L: What processes are carried out by homeworkers?	NA		
M: Do any contracts exist for homeworkers	<input type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:		
N: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No		

**9: No Harsh or Inhumane Treatment is Allowed**

[\(Click here to return to NC-table\)](#)

**ETI**

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Additional elements:

9.2 companies should provide access to a confidential grievance mechanism for all workers

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&amp;S or any other grievances to a 3<sup>rd</sup> party?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please describe:                  There is suggestion box for reporting.</p>
<p>B: If <b>Yes</b>, are workers aware of these channels and have access? Please give details.</p>	<p>All workers are aware of these processes, suggestion box is known by all workers</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>Compliant issues are discussed at senior management level and investigated</p>
<p>D: Is there a grievance mechanism in place for:</p>	<p><input checked="" type="checkbox"/> Workers  <input type="checkbox"/> Communities  <input type="checkbox"/> Suppliers  <input type="checkbox"/> Other                   Details: Compliant box</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                   If yes, please give details</p>
<p>F: Does grievance mechanism meet with UNGP requirement of e.g. (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                   If no, please give details</p>
<p>G: Does the site \ encourage its business partners (e.g., suppliers) provide individuals and communities with access to effective grievance mechanisms</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  If No Please give details : This matter is not discussed with the site's business Directors</p>

(e.g., help lines or whistle blowing mechanism)	
H: Is there a published and transparent disciplinary procedure	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No please explain
I: If yes, are workers aware of these the disciplinary procedure	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no please give details
J: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes please give details

**Current Systems and Evidence Examined**

*To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*

**Current systems:**

- Anti harassment policy
- Sexual harassment prevention committee meeting records

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):**

- No evidence found for harsh or inhumane treatment in the factory.
- Factory has formed Sexual Harassment Prevention Committee, which meets once in a Quarter. This was confirmed during workers interviews Last meeting was held on 30/06/2018
- Workers interviews confirmed that they are treated well in the factory and there is no harsh & inhumane treatment in the factor
- Facility has engaged an “WEAD Trust” as external member in Sexual harassment prevention committee

**Non-compliance:**

<p><b>1. Description of non-compliance: None Observed on the Day of Audit</b></p> <p><input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law:    <input type="checkbox"/> NC against customer code:</p> <p>None observed</p> <p><b>Local law and/or ETI requirement : None</b></p> <p><b>Recommended corrective action: None</b></p>	<p><b>Objective evidence observed:</b></p> <p><i>(where relevant please add photo numbers)</i></p>
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Observation:	
<b>Description of observation:</b> None  <b>Local law or ETI requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>

Good Examples observed:	
<b>Description of Good Example (GE):</b> None	<b>Objective Evidence Observed:</b>



**10. Other Issue areas: 10A: Entitlement to Work and Immigration**

[\(Click here to return to NC-table\)](#)

**Additional Elements**

10A.1 Only workers with a legal right to work shall be employed or used by the supplier.  
 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

**Current Systems and Evidence Examined**

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

**Current systems:**

1. Recruitment policy
2. Personal files verification of sampled workers

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):**

- All workers working in the factory found to be Indian Nationals and they have rights to work anywhere in India. Same was confirmed in management and workers interviews

**Non-compliance:**

**1. Description of non-compliance: None Observed on the Day of Audit**

NC against ETI       NC against Local Law:       NC against customer code:

None observed

**Local law and/or ETI requirement : None**

**Recommended corrective action: None**

**Objective evidence observed:**

*(where relevant please add photo numbers)*

**Observation:**

**Description of observation:**

**Local law or ETI/Additional Elements requirement:**

**Comments:**

**Objective evidence observed:**

Good examples observed:	
Description of Good Example (GE): None	Objective Evidence Observed:

**10. Other issue areas 10B2: Environment 2–Pillar**  
*[\(Click here to return to NC-table\)](#)*  
 To be completed for a 2–Pillar SMETA Audit, and remove the following page which is 10B4 environment 4 pillar

10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.  
 10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements. *Note for auditors and readers, This is not a full environmental assessment but a check on basic systems and management approach.*

**Current Systems and Evidence Examined**  
*To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*

**Current systems:**

During the assessment, the assessment team noted that the facility is in compliance with local environmental regulations, in addition to this the facility disposes off the cutting waste, paper waste, scraps and garbage to keep the facility clean and the working environment safe.

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):**

Details:

- Factory tour
- Worker interview
- Management interview

Any other comments: NONE









Non-compliance:	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI/Additional Elements      <input type="checkbox"/> NC against Local Law</p> <p>None observed</p> <p><b>Local law:</b> N/A</p> <p><b>Recommended corrective action:</b> None</p>	<p><b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i></p>






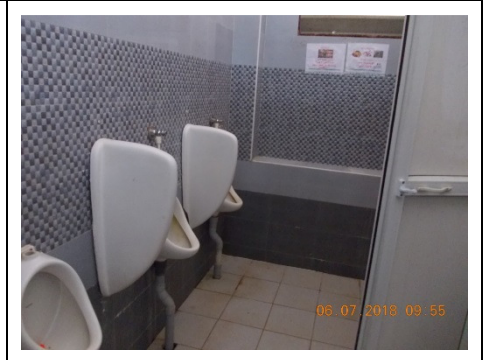

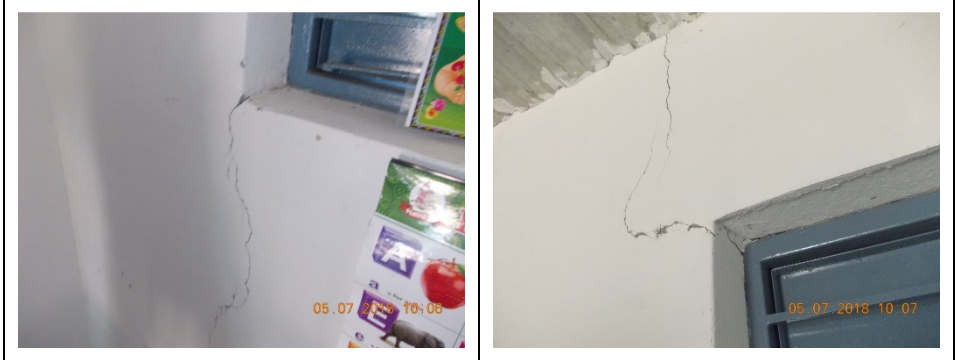
Observation:	
<p><b>Description of observation:</b> None observed during the audit</p> <p><b>Local law or ETI/additional elements requirement:</b></p> <p><b>Comments:</b> None</p>	<p><b>Objective evidence observed:</b></p>

Good examples observed:	
<p><b>Description of Good Example (GE):</b> None</p>	<p><b>Objective Evidence Observed:</b></p>

## Photo Form

<p>Main entrance of the factory</p>	<p>Name board of the factory</p>	<p>Policies displayed</p>
<p>Working hours</p>	<p>No Child labour display</p>	<p>Emergency Contact details</p>
<p>Fire Alarm panel</p>	<p>ERT Member List</p>	<p>First Aid Box</p>

		
<p>Emergency Signage</p>	<p>Fire extinguisher</p>	<p>Manual call point</p>
		
<p>Smoke detector</p>	<p>Dining Hall</p>	<p>Suggestion Box</p>
		
<p>Fabric section</p>	<p>Cutting section</p>	

		
<p>Fusing section</p>	<p>Sewing section</p>	<p>Checking section</p>
		
<p>Ironing section</p>	<p>Packing Section</p>	<p>Toilet facilities</p>
		
<p>NC: Cutting Machine without Guard</p>	<p>NC. Cracks in Creche</p>	



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Your feedback on your experience of the SMETA audit you have observed is extremely valuable. It will help to make improvements to future versions.

You can leave feedback by following the appropriate link to our questionnaire:

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[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw\\_3d\\_3d](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

**[Click here for Supplier \(B\) members:](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d)**

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